

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA GEAR CORPORATION, )  
Plaintiff )  
 )  
v. ) No. 02 CV 4359  
 )  
ACSA STEEL FORGINGS, S.p.A., )  
Defendant ) TRIAL BY JURY DEMANDED

**MOTION FOR ADMISSION PRO HAC VICE**

1. Defendant, ACSA Steel Forgings, S.P.A., does hereby respectfully request the admission pro hac vice of Attorney Craig A. Markham for the purpose of appearing and participating in this lawsuit on behalf of said Defendant.

2. Attorney Markham is a partner with the law firm of Elderkin, Martin, Kelly & Messina, P.C., 150 East Eighth Street, Erie PA 16501, (814) 456-4000. Since 1983 he has been admitted to practice by the Supreme Court of the Commonwealth of Pennsylvania (Supreme Ct. #38531) and by the United States District Court for the Western District of Pennsylvania. Since 1985, he has been admitted to practice by the United States Court of Appeals for the Third Circuit. Attorney Markham is currently a member, in good standing, of the bar of all of the foregoing courts. Attorney Markham has never been disbarred or the subject of disciplinary action by any court.

3. Defendant respectfully requests that this Court issue an order admitting Attorney Markham pro hac vice so as to permit him to appear and participate on behalf of the Defendant in this matter. Attorney Markham is counsel of record for the Defendant in a related action earlier filed by the Defendant against Pennsylvania Gear Corporation in the United States District Court for the Western District of Pennsylvania (CA 01-265) and he is, therefore, familiar with the legal issues raised by the parties and he is knowledgeable of the facts of this dispute. As such, the Defendant desires to have Attorney Markham represent it in this litigation.

4. As this motion involves no novel or unique legal issues, defendant requests that any briefing requirement be waived.

WHEREFORE, defendant respectfully requests that the court enter an order admitting Craig A. Markham, Esquire pro hac vice.

Respectfully submitted,

Date: \_\_\_\_\_

By: \_\_\_\_\_  
Michael H. Landis, Esquire  
204 Two Neshaminy Interplex  
Trevose, Pennsylvania 19053  
(215) 244-0880

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## ORDER

AND NOW this \_\_\_\_\_ day of \_\_\_\_\_, 2002, upon  
consideration of Defendant's Motion For Admission Pro Hac Vice, said Motion is GRANTED.  
Attorney Craig A. Markham is hereby admitted pro hac vice for purposes of representing the  
Defendant in this matter.

J.

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**CERTIFICATE OF SERVICE**

I certify that on the 27th day of September, 2002, I served a copy of the Motion  
For Admission Pro Hac Vice on the following individuals and in the manner indicated below:

U.S. First Class Mail, Postage Prepaid:

Mohammad Ghiasuddin, Esquire  
350 Sentry Parkway, Building 640  
Blue Bell, Pennsylvania 19422

Attorney for Plaintiff

Respectfully submitted,

Date: \_\_\_\_\_

By: \_\_\_\_\_

Michael H. Landis, Esquire  
204 Two Neshaminy Interplex  
Trevose, Pennsylvania 19053  
(215) 244-0880